

# EXHIBIT C

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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STEPHEN VINSON, :  
: Plaintiff, : 15CV1452(ILG)(RER)  
: :  
: - against - :  
: :  
THE CITY OF NEW YORK, VICTOR ENG, : PLAINTIFF'S FIRST SET  
IGOR BONDARENKO, and "JOHN DOE" : OF INTERROGATORIES  
# 1 - 3, in Their Individual Capacities and in : TO THE DEFENDANTS  
Their Official Capacities, :  
: :  
Defendants :  
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Plaintiff Stephen Vinson hereby demands that defendants The City of New, Victor Eng and Igor Bondarenko answer, in writing, under oath, the following interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure and serve the answers to these interrogatories upon the undersigned within 30 days.

**DEFINITIONS**

A. As used herein, the word "person" shall mean any natural person, proprietorship, partnership, corporation, business organization, public organization, governmental body, or agency, group, association, or organization.

B. "Document" shall mean and include all writings, drawings, graphs, charts, photographs, sound recordings, images and other data or data compilations from which information can be obtained, including, without limitation, electronically stored information.

C. "Communication" shall mean the transmittal of information in the form of facts, ideas, inquiries or otherwise.

D. "Concerning" means relating to, referring to, describing, evidencing or constituting.

E. "Employee" refers to any person, including but not limited to, all officials, executives, managers, supervisors, professionals, hourly and salaried personnel, who were employed on a full or part-time basis and on a temporary or permanent basis.

### **INSTRUCTIONS**

If you claim that a privilege prevents you from answering any of these interrogatories, state the nature of the privilege and the grounds for its assertion. In addition, state the names of all persons, whether natural or artificial, who are privy to the information sought, and if such information is contained in a document in your possession, custody or control, list the names and addresses of all persons, natural or artificial, who received or reviewed the document.

### **INTERROGATORIES**

1. Identify all persons (a) answering these interrogatories and (b) providing information in connection with the answering of these interrogatories.
2. State the names, shield numbers, and present employment status of all police officers employed by the City of New York who guarded plaintiff Stephen Vinson at Lutheran Medical Center between December 22, 2013 and January 3, 2014, indicating the date and tour on which each officer guarded the plaintiff.
3. State the name, shield number, rank or job title, and present employment status of the patrol supervisor who responded to Lutheran Medical Center on the night of December 22 - 23, 2013 to evaluate the situation of plaintiff Stephen Vinson.
4. State the name, shield number, rank or job title, and present employment status of the Borough Court Section Supervisor for the borough of Brooklyn from December 22, 2013 to January 3, 2014.

5. State the precinct of hospitalization of plaintiff Stephen Vinson from December 22, 2013 to January 3, 2014.

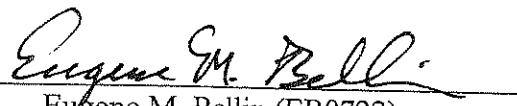
6. State the names, shield numbers, ranks or job titles, and present employment status of the desk officers of the precinct of hospitalization of plaintiff Stephen Vinson from December 22, 2013 to January 3, 2014.

7. State the precinct of detention of plaintiff Stephen Vinson from December 22, 2013 to January 3, 2014.

6. State the names, shield numbers, ranks or job titles, and present employment status of the desk officers of the precinct of detention of plaintiff Stephen Vinson from December 22, 2013 to January 3, 2014.

Dated: New York, New York  
February 18, 2016

MICHELSTEIN & ASSOCIATES, PLLC

By:   
Eugene M. Bellin (EB0722)  
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To: Deborah L. Mbabazi, Esq.  
Zachary W. Carter, Esq.  
Corporation Counsel of the City of New York  
Attorney for Defendants  
100 Church Street, Room 3-187  
New York, New York 10007

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that on February 18, 2016, I served a true and correct copy of Plaintiffs' First Set of Interrogatories to the Defendants by mailing the copy enclosed in a properly addressed, postage paid first class wrapper through the United States Postal Service, on the following attorney of record:

Deborah L. Mbabazi, Esq.  
Zachary W. Carter, Esq.  
Corporation Counsel of the City of New York  
100 Church Street, Room 3-187  
New York, New York 10007

Dated: February 18, 2016

  
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Eugene M. Bellin